

## INITIAL STUDY

*The Department of Toxic Substances Control (DTSC) has completed the following Initial Study for this project in accordance with the California Environmental Quality Act (§ 21000 et seq., California Public Resources Code) and implementing Guidelines (§15000 et seq., Title 14, California Code of Regulations).*

I. PROJECT INFORMATION

Project Name: Pier A West/Area 2

Site Address: 421 Henry Ford Avenue

City: Wilmington State: CA Zip Code: 90744 County: Los Angeles

Company Contact Person: Stuart Berge, Port of Long Beach

Address: 925 Harbor Plaza, P.O. Box 570

City: Long Beach State: CA Zip Code: 90802 Phone Number: (562) 590-4160

**Project Description:** The proposed project consists of remediation activities for soil and groundwater contamination. The remedial activities would be consistent with the Remedial Action Plan. Soil remediation will consist of excavation and onsite stabilization. Groundwater remediation will consist of one, or a combination of, the following in-situ remediation alternatives: enhanced bioremediation, pump-and-treat, and chemical oxidation. Pump-and-treat remediation has been identified as the preferred alternative. The existing oil field activities will be consolidated into the eastern portion and potentially into a separate southwestern portion of the project site order to continue oil production. Any contaminated materials that exceed the threshold requirements of South Coast Air Quality Management District's Rule 1166 would be excavated and transported off-site for disposal. It is estimated that no more than ten percent of the contaminated materials would be subject to the requirements of Rule 1166. The majority of the project site will be elevated by approximately sixteen feet and capped with asphalt paving. No subsequent uses of the project site are proposed.

**Project Activities:** Implementation of the proposed project would involve short-term, construction-related activities and long-term, operations-related activities. Activities included in the short-term period include the following major groupings: soil handling; oil field production; groundwater well sampling; storm water treatment and conveyance; temporary utility connections and lighting; temporary traffic controls and access; dust control measures; landscaping, structure removal and demolition; and use of various types of construction equipment. Major activities included in the long-term period include the following major groupings: Air and water quality monitoring; oil production; landscape maintenance; and maintenance of a storm water collection and treatment system.

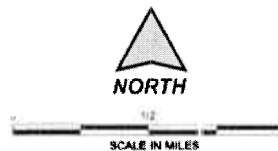
**Project Location:** The project site is located within the County of Los Angeles and within the corporate boundaries of the City of Los Angeles, and within the boundaries of the City's Wilmington-Harbor City Community Planning area. The Project site is located west of the Terminal Island Freeway (State Route 103) and is bordered on the north and west by the Consolidated Slip Channel, on the south by Port of Los Angeles Anchorage Road soil stockpile, and on the east by Henry Ford Avenue. The site is shown on Figure 1-1, Site Location Map.

**Vicinity Environmental Setting:** The project site is located within the harbor area developed with the Ports of Los Angeles and Long Beach. Commercial marine terminals, recreational marinas, navigation channels, marine-related support facilities, and oil production facilities characterize this area. Non-marine facilities in the vicinity of the project site include a power-generating facility, restaurants, commercial aquarium, and a federal prison.

Tetra Tech, Inc.

FIGURE 1-1  
SITE LOCATION MAP

J/2396, Projects/11821 (Pier A West)/11821-06/11821-06, Figure 1-3a  
 Final Feasibility Study  
 Pier A West



TC 11821-06  
 August 2005

## II. DISCRETIONARY APPROVAL ACTION BEING CONSIDERED BY DTSC

- |  |  |  |
|--|--|--|
| <input type="checkbox"/> Initial Permit Issuance | <input type="checkbox"/> Closure Plan                    | <input type="checkbox"/> Removal Action Workplan |
| <input type="checkbox"/> Permit Renewal          | <input type="checkbox"/> Regulations                     | <input type="checkbox"/> Interim Removal         |
| <input type="checkbox"/> Permit Modification     | <input checked="" type="checkbox"/> Remedial Action Plan | <input type="checkbox"/> Other (Specify)         |

Program/ Region Approving Project: Southern California Cleanup Operations Branch

DTSC Contact Person: Safouh Sayed, Project Manager

Address: 5796 Corporate Avenue

City: Cypress State: CA Zip Code: 90630 Phone Number: (714) 484-5478

**III. ENVIRONMENTAL RESOURCES POTENTIALLY AFFECTED**

The boxes checked below identify environmental resources in the following ENVIRONMENTAL SETTING/IMPACT ANALYSIS section found to be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact."

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> None Identified                       | <input checked="" type="checkbox"/> Aesthetics                      | <input type="checkbox"/> Agricultural Resources                 |
| <input checked="" type="checkbox"/> Air Quality                | <input type="checkbox"/> Biological Resources                       | <input type="checkbox"/> Cultural Resources                     |
| <input checked="" type="checkbox"/> Geology And Soils          | <input checked="" type="checkbox"/> Hazards and Hazardous Materials | <input checked="" type="checkbox"/> Hydrology and Water Quality |
| <input type="checkbox"/> Land Use and Planning                 | <input type="checkbox"/> Mineral Resources                          | <input checked="" type="checkbox"/> Noise                       |
| <input checked="" type="checkbox"/> Population and Housing     | <input checked="" type="checkbox"/> Public Services                 | <input type="checkbox"/> Recreation                             |
| <input checked="" type="checkbox"/> Transportation and Traffic | <input checked="" type="checkbox"/> Utilities and Service Systems   |   |

**IV. ENVIRONMENTAL IMPACT ANALYSIS**

The following pages provide a brief description of the physical environmental resources that exist within the area affected by the proposed project and an analysis of whether or not those resources will be potentially impacted by the proposed project. Preparation of this section follows guidance provided in DTSC's California Environmental Quality Act Initial Study Workbook [Workbook]. A list of references used to support the following discussion and analysis are contained in Attachment A and are referenced within each section below.

Mitigation measures which are made a part of the project (e.g.: permit condition) or which are required under a separate Mitigation Measure Monitoring or Reporting Plan which either avoid or reduce impacts to a level of insignificance are identified in the analysis within each section.

**1. Aesthetics**

***Project activities likely to create an impact:*** Soil handling, oil production, construction equipment, and landscaping.

***Description of Environmental Setting:*** The 123-acre project site is a relatively flat, dirt site, characterized by producing oil wells and two land-farm remediation (bug-farm) areas. No distinctive visual features exist. Bordering portions of the site are recreational marinas. The surrounding area is characterized by industrial activities.

***Analysis of Potential Impacts. Describe to what extent project activities would:***

**a. Have a substantial adverse effect on a scenic vista.**

The project site is located in an industrialized area bordered on the north and west by the Consolidated Slip Channel, on the south by Port of Los Angeles Anchorage Road soil stockpile, and on the east by Henry Ford Avenue. The EIR will verify that there are no designated scenic vistas in the vicinity of the project site. Less than significant impacts are anticipated.

**b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and historic buildings within a state scenic highway.**

The project site is not located within or adjacent to a designated State Scenic Highway. Therefore, implementation of the proposed project would not impact scenic resources within a designated scenic highway.

**c. Substantially degrade the existing visual character or quality of the site and its surroundings.**

The majority of the project site would be elevated to approximately 16 feet above surrounding grade. Because the project site is visually accessible from the nearby marinas, the East Basin Channel and Consolidated Slip Channel and other areas in the harbor, the project has the potential to affect the existing visual character of the surrounding

area. Therefore, the EIR will discuss the potential impacts to the visual character of the areas that have visual accessibility to the project site.

- d. **Create a new source of substantial light of glare that would adversely affect day or nighttime views in the area.**

The project does not propose any subsequent use of the site other than the continued operation of the oil field. Because no land use is proposed, the project does not represent a new, permanent, long-term source of light and glare. Temporary, short-term construction-related activities would require the use of construction equipment that could reflect sunlight and also require nighttime lighting. However, these activities are not permanent and would cease upon completion of the project. Therefore, less than significant impacts from light and glare would result from project implementation.

- Specific References:**
- a. Preliminary Draft Remedial Action Plan
  - b. State of California, Department of Transportation (Caltrans), California Scenic Highway Mapping System

**Findings of Significance:**

- ☒ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☐ No Impact

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**2. Agricultural Resources**

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**Project activities likely to create an impact:** No agricultural resources exist on the project site, therefore none of the project activities have the potential to create an impact.

**Description of Environmental Setting:** The project site contains approximately 123 acres of disturbed soil containing producing oil wells and two land-farm remediation (bug-farm) areas. Previous use of the site included disposal of oil field wastes and other materials into shallow impoundments known as "sumps." No agricultural-related uses or other uses have occurred presently or historically on the project site.

**Analysis of Potential Impacts. Describe to what extent project activities would:**

- a. **Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.**

The project site does not contain any Farmland, is not zoned for agricultural production, or contain any land contract pursuant to the Williamson Act. There are no agricultural resources in the vicinity of the project site. Therefore, implementation of the proposed project would not result in any impacts to Farmland, conflicts with agricultural zoning or Williamson Act contracts, or have the potential to induce the conversion of agricultural land to non-agricultural land in the vicinity of the project site.

- b. **Conflict with existing zoning or agriculture use, or Williamson Act contract.**

Refer to Response 2(a), above.

- c. **Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural uses.**

Refer to Response 2(a), above.

**Specific References:** a. City of Los Angeles, General Plan Land Use Element, Wilmington-Harbor City Community Plan

**Findings of Significance:**

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

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**3. Air Quality**

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**Project activities likely to create an impact:** Soil handling (onsite and offsite) including haul trucks and heavy equipment activities, oil production, construction equipment, and dust control measures.

**Description of Environmental Setting:** The project site is located in the South Coast Air Basin (SCAB). The air quality in the project area is characterized by the high level of industrial activity and traffic, especially trucks, in the immediate area. Details of the existing setting will be presented in the EIR.

**Analysis of Potential Impacts. Describe to what extent project activities would:**

**a. Conflict with or obstruct implementation of the applicable air quality plan.**

Based on modeling to be conducted to determine project activity emissions and the extent to which those emissions exceed emissions criteria, the EIR will discuss the potential to conflict with the air quality management plan, potential to violate air quality standards, and the potential for cumulative impacts that would result from implementation of the proposed project.

**b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation.**

Construction of the remedy will entail the use of heavy equipment working onsite and haul trucks for the import of fill materials and some possible export of materials that may not be treated onsite. The EIR will discuss the potential to violate air quality standards, which are expected to result in a significant impact.

**c. Result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).**

Refer to Response 3(a), above.

**d. Expose sensitive receptors to substantial pollutant concentrations.**

Recreational marinas are located adjacent to and in proximity to the project site. The Final Baseline Risk Assessment Report prepared for the proposed project existing conditions will be summarized in the EIR and a risk assessment of the remedy will address both short-term and long-term impacts.

**e. Create objectionable odors affecting a substantial number of people.**

No permanent use of the site is proposed other than continued oil production. Therefore, there would not be any potential for objectionable odors emanating from the project site. Therefore, post remedy impacts would be less than significant. There is a potential for transient odors to occur during the construction period. The nature and type of odors expected will be presented and the potential for any temporary impacts to the marina residents will be evaluated.

**f. Result in human exposure to Naturally Occurring Asbestos (see also Geology and Soils, 6.f.).**

The project site is generally comprised of dredge materials from the development of the harbor in the early 1920s and oil field wastes disposed of on-site. The composition of the project site precludes exposure from naturally occurring asbestos. Therefore, no impacts would result.

**Specific References:** a. Preliminary Draft Remedial Action Plan**Findings of Significance:**

- ☒ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☐ No Impact

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**4. Biological Resources**

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**Project activities likely to create an impact:** Soil handling and oil production.

**Description of Environmental Setting:** The 123-acre project site is a relatively flat, dirt site, characterized by producing oil wells and two land-farm remediation (bug-farm) areas. Little to no vegetation exists onsite. An Ecological Risk Assessment (ERA) has been prepared for the project to document existing conditions related to fish and invertebrates. The ERA found sparse, ruderal vegetation and no sensitive habitats on the site.

**Analysis of Potential Impacts. Describe to what extent project activities would:**

- a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

The ERA documentation of existing conditions related to fish and invertebrates will be discussed and any impacts from activities associated with the remedy presented. It is not expected that candidate, sensitive, or special status species maintain breeding areas or that critical habitat is onsite, however, a reconnaissance-level survey of the site to determine the nature and extent of biological resources will be conducted. It is expected that no adverse significant impacts would occur.

- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

It is not expected that riparian habitat or sensitive communities exist onsite, however a reconnaissance-level survey of the site to determine the nature and extent of biological resources will be conducted. Impacts are expected to be less than significant.

- c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

No jurisdictional waters exist on the project site. Therefore, no impacts would result.

- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Due to the highly disturbed condition of the project site, the presence of wildlife species is not anticipated. A reconnaissance-level survey will be conducted to document the absence of such species. The results will be presented in the EIR.

- e. Conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

There are no known policies or ordinances associated with the project site. Therefore, no impacts would result.

- f. **Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.**

There are no adopted conservation plans associated with the project site. Therefore, no impacts would result.

**Specific References:** a. Ecological Risk Assessment, Contained in Baseline Risk Assessment.

*Findings of Significance:*

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☒ Less Than Significant Impact  
☐ No Impact

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**5. Cultural Resources**

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**Project activities likely to create an impact:** Soil handling, oil production, groundwater treatment system, and structure removal/demolition.

**Description of Environmental Setting:** The project site contains approximately 123 acres and is developed with producing oil wells and two land-farm remediation (bug-farm) areas. Previous use of the site included disposal of oil field wastes and other materials into shallow impoundments known as “sumps.” The project site contains two small buildings, portable structures and oil field equipment. No other uses occur on the project site.

**Analysis of Potential Impacts. Describe to what extent project activities would:**

- a. **Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5.**

The project site is highly disturbed from existing and past industrial activities. In addition, the site is believed to have been constructed from fill materials, and would therefore not be expected to contain any paleontological, cultural, or historical resources. Available documentation will be reviewed, and a records search will be conducted to determine if any cultural resources have been documented to occur on the or in the vicinity of the project site. The results of this records survey will be summarized in the EIR. Should cultural resources be identified in the vicinity of the project site, potential impacts to these resources would be discussed.

- b. **Cause a substantial adverse change in the significance of an archeological resource pursuant to 15064.5.**

Refer to Response 5(a), above.

- c. **Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.**

Refer to Response 5(a), above.

- d. **Disturb any human remains, including those interred outside of formal cemeteries.**

Refer to Response 5(a), above.

**Specific References:**

*Findings of Significance:*

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☒ Less Than Significant Impact  
☐ No Impact

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**6. Geology and Soils**

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**Project activities likely to create an impact:** Soil handling, oil production, and groundwater treatment system.

**Description of Environmental Setting:** The project site is generally comprised of dredge materials from the development of the harbor in the early 1920s and oil field wastes disposed of on-site. Because of this, very little native topsoil exists on the site. The site is located in a seismically active area that has a high potential for liquefaction and subsidence.

**Analysis of Potential Impacts. Describe to what extent project activities would:**

- a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. (Refer to Division of Mines and Geology Special Publication 42).

Strong seismic ground shaking.

Seismic-related ground failure, including liquefaction.

Landslides.

Based on the proposed remedy, the EIR will discuss the remedy and its potential impacts from earthquake faults, seismically induced ground shaking, and liquefaction. Due to the relatively level nature of the project and the absence of any slopes adjacent to the project site, no landslide potential exists.

- b. Result in substantial soil erosion or the loss of topsoil.

The project site is generally comprised of dredge materials from the development of the harbor in the early 1920s and oil field wastes disposed of on-site. Because of this, very little native topsoil exists on the site and no impacts from loss of topsoil would be expected. Moreover, the project proposes to cover the majority of the site in an impermeable asphalt cover and install storm water conveyance features. The remedy will change the elevation of the site through the addition of 16 feet of soil to cap the site. There is a potential for soil erosion under the site unless it is stabilized. The potential for impact will be presented. Impacts would be expected to be mitigated to less than significant.

- c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

Refer to Response 6(a), above.

- d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

No expansive soils have been identified on the project site, however, this will be confirmed during the EIR analysis. Moreover, no subsequent uses are proposed for the site. Therefore, no impacts from expansive soils are expected.



- e. **Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of water.**

The project does not propose any development. Therefore, no wastewater disposal systems are required and no impacts would result.

- f. **Be located in an area containing naturally occurring asbestos (see also Air Quality, f.).**

Refer to Response 3(f), above.

**Specific References:** a. Final Feasibility Study Report  
b. Final Remediation Investigation Report

*Findings of Significance:*

- ☐ Potentially Significant Impact  
☒ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☐ No Impact

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**7. Hazards and Hazardous Materials**

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***Project activities likely to create an impact:*** Soil handling, oil production, and groundwater treatment system

***Description of Environmental Setting:*** Three media at the Site are impacted from the past oil field production and disposal activities: soil, shallow groundwater, and soil vapor. A total of 19 sumps containing oily wastes are the primary location of contaminants with an estimated quantity of 165,900 in-situ cubic yards (cy). Three distinct groundwater plumes contaminated with vinyl chloride and other chlorinated hydrocarbon compounds were identified.

***Analysis of Potential Impacts. Describe to what extent project activities would:***

- a. **Create a significant hazard to the public or the environment throughout the routine transport, use or disposal of hazardous materials.**

The project site has been identified as containing hazardous waste materials, sump and groundwater. Some of the sump material contains concentrations of metals that exceed the CA Title 22 hazardous waste regulatory level. However, the project remedy proposes to stabilize the material, limiting if not entirely eliminate leaching of metals, keep the material onsite, and cap the material with an asphalt cover, eliminating future contact for onsite workers and offsite residents as well as prevent infiltration of surface water into the stabilized sump material. An estimated 10 percent of sump material will be disposed offsite that exceeds the SCAQMD Rule 1166 and some of which may also exceed Title 22 hazardous waste regulatory levels. This may result in a potentially significant impact during transport.

The groundwater contains concentrations of volatile organic compounds that exceed RCRA hazardous waste levels, primarily of vinyl chloride. The project includes treatment of groundwater either by in-situ treatment or ex-situ pump and treat technologies. The EIR will evaluate the treatment of hazardous groundwater for affects to the pubic and environment.

- b. **Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.**

The EIR will present the potential for health hazards and health risk based on the Preliminary Draft Remedial Action Plan and the Baseline Risk Assessment (HHRA) prepared for the proposed project. In addition, the EIR will evaluate the potential for hazards/risk from implementation of the remedy. Any potentially significant impacts during construction and post-construction will be discussed.

- c. **Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school.**

The closest school to the project site is Banning High School, located approximately 1.2 miles northwest of the project site. Therefore, no impacts to school facilities from the use of hazardous materials would result from project implementation.

- d. **Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to public or the environment.**

The project site has been identified as containing several types of hazardous waste materials from several different sources. The proposed project is the remediation of these materials. The Final Feasibility Study Report and the Preliminary Draft Remedial Action Plan prepared for the project will be discussed and the potentially significant impacts will be identified.

- e. **Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.**

The EIR will determine if there are any emergency response plans in the vicinity of the project site and if the short-term activities would interfere with any such plans. Less than significant impacts are anticipated.

**Specific References:**

- a. Final Feasibility Study Report
- b. Preliminary Draft Remedial Action Plan
- c. Final Baseline Risk Assessment

*Findings of Significance:*

- ☒ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☐ No Impact

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**8. Hydrology and Water Quality**

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**Project activities likely to create an impact:** Soil handling, oil production, groundwater treatment system, and storm water system.

**Description of Environmental Setting:** Most of the Site is below sea level, and engineered features such as levees have been installed to protect the Site from flooding.

**Analysis of Potential Impacts. Describe to what extent project activities would:**

- a. **Violate any water quality standards or waste discharge requirements.**

The impact analysis will focus on the potential impacts to the existing storm water filtration system and on-site storm water conveyance system and include a discussion of the remedy, in terms of any potential interim impacts that may occur during the construction. Any potential impacts will be mitigated. This will include an analysis of features that may be required during construction, such as additional levees, dikes, drainage catch basins, berming and other means that may be required to protect the adjacent surface water. In terms of post construction, once the Site is paved, compliance with applicable permitting for surface runoff would either be subject to the Regional Water Quality Control Board Waste Discharge Requirements or National Pollution Discharge Elimination System Permits. The analysis will also include a discussion of the Storm Water Pollution Prevention Plan.

- b. **Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficient in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).**

The project includes treatment of contaminated groundwater and placement of stabilized sump material into designated areas with an asphalt cap. The EIR will evaluate the reduction of surface water runoff and groundwater infiltration by the proposed site remedy. However, it is noted that the groundwater is non-potable due to its high concentrations of total dissolved solids. The tidal influence is a natural phenomena due to the tidal cycles and is experienced by most properties adjacent to the Ports. The groundwater along the western section is not contaminated and is not designated for treatment.

In-situ groundwater treatment will not alter the groundwater table and will not have any impact. Ex-situ groundwater treatment will be evaluated in the EIR. Pump and treatment of the two contaminated groundwater areas may have a significant impact to the site groundwater table.

Domestic water lines exist onsite currently for oil production support.

- c. **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off-site.**

The existing drainage pattern of the project site would be substantially altered by the proposed project through the addition of 16-feet of soil to cap the site. The EIR will describe the proposed site hydrology and drainage and storm water treatment system. The site hydrology, drainage and storm water treatment system would be designed in a manner that precludes erosion from occurring. Therefore, impacts would be expected to be less than significant.

- d. **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site.**

Refer to Response 8(d), above.

- e. **Create or contribute runoff water, which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.**

The EIR will describe the proposed storm water treatment system that will only discharge off-site into the Consolidated Slip Channel and not into any other existing storm drain facilities. Because of this, no other vicinity storm drains would be impacted. The proposed storm drain system would include water quality treatment. Therefore, less than significant impacts would result.

- f. **Otherwise substantially degrade water quality.**

Refer to Response 8(e), above.

- g. **Place within a 100-flood hazard area structures, which would impede or redirect flood flows.**

The project does not propose any structures. Therefore, no impacts related to flood flows would result.

- h. **Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.**

There is no dam in close proximity to the project site. In addition, no structures are proposed by the project. Therefore, no impacts from the failure of dam or levee to structures would result from project implementation.

**Inundation by sieche, tsunami or mudflow.**

Because the project site is located in a harbor area adjacent to the Pacific Ocean, the potential for the project site to be affected by a tsunami is possible. However, because the potential is remote and speculative, impacts are considered to be less than significant.

**Specific References:** a. Final Feasibility Study Report  
b. Preliminary Draft Remedial Action Plan

**Findings of Significance:**

- ☐ Potentially Significant Impact  
☒ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☐ No Impact

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**9. Land Use and Planning**

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**Project activities likely to create an impact:** Oil production and concrete cover.

**Description of Environmental Setting:** The project site is located within the harbor area developed with the Ports of Los Angeles and Long Beach. Commercial marine terminals, recreational marinas, navigation channels, marine-related support facilities, and oil production facilities characterize this area.

**Analysis of Potential Impacts. Describe to what extent project activities would:**

- a. **Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.**

The EIR will discuss the relationship of the proposed project with applicable plans, policies and regulations. Because no development is proposed, conflicts are not anticipated and less than significant impacts are expected.

- b. **Conflict with any applicable habitat conservation plan or natural community conservation plan.**

Refer to Response 3(f), above.

**Specific References:** a. City of Los Angeles, Wilmington-Harbor City Community Plan

**Findings of Significance:**

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☒ Less Than Significant Impact  
☐ No Impact

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**10. Mineral Resources**

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**Project activities likely to create an impact:** Oil production.

**Description of Environmental Setting:** The project site contains approximately 123 acres and is developed with producing oil wells and two land-farm remediation (bug-farm) areas. Previous use of the site included disposal of oil field wastes and other materials into shallow impoundments known as "sumps." No other uses occur on the project site.

**Analysis of Potential Impacts. Describe to what extent project activities would:**

- a. **Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.**

The site is currently used for oil production. The project proposes to consolidate the existing oil field activities, which are located throughout the site, to the eastern portion of the project site adjacent to Henry Ford Avenue. This will allow for the continued oil production to occur. Therefore, implementation of the proposed project would not result in the loss of this mineral resource.

- b. **Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.**

The project site is not designated for mineral resource recovery. Therefore, no impacts would result.

**Specific References:** a. City of Los Angeles, Wilmington-Harbor City Community Plan

**Findings of Significance.**

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

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**11. Noise**

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**Project activities likely to create an impact:** Soil handling, oil production, construction equipment, and structure removal/demolition.

**Description of Environmental Setting:** The project site is located within the harbor area developed with the Ports of Los Angeles and Long Beach. Commercial marine terminals, recreational marinas, navigation channels, marine-related support facilities, and oil production facilities characterize this area.

**Analysis of Potential Impacts. Describe to what extent project activities would:**

- a. **Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.**

Several recreational marinas are adjacent to or in proximity to the project site. Many of the boats are maintained as year-round residential dwelling units. A noise study will be conducted and the results will be summarized in the EIR. The EIR will also evaluate and discuss applicable noise standards. It is expected that construction activity may result in impacts to marina residents; however, adherence to the local construction noise ordinance would reduce impacts to less than significant.

- b. **Exposure of persons to or generation of excessive groundbourne vibration or groundbourne noise levels.**

Refer to Response 11(a), above.

**A substantial permanent increase in ambient noise levels in the vicinity above levels existing without the project.**

Refer to Response 11(a), above.

- d. **A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.**

Refer to Response 11(a), above.

**Specific References:** a. Website: [www.boatsandharbors.com](http://www.boatsandharbors.com)

**Findings of Significance:**

- ☐ Potentially Significant Impact  
☒ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☐ No Impact

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**12. Population and Housing**

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**Project activities likely to create an impact:** Soil handling.

**Description of Environmental Setting:** The project site is located within the harbor area developed with the Ports of Los Angeles and Long Beach. Commercial marine terminals, recreational marinas, navigation channels, marine-related support facilities, and oil production facilities characterize this area.

**Analysis of Potential Impacts. Describe to what extent project activities would:**

- a. Induce substantial population growth in area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

The project does not propose any development or any type of infrastructure that has the potential to induce population growth. Therefore, no impacts would result.

- b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.

The project has the potential to temporarily displace persons during the construction period who live aboard boats in the marinas that are adjacent to or in close proximity to the project site. The EIR will discuss the potential impacts.

- c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

Refer to Response 12(b), above.

**Specific References.** a. Website: [www.boatsandharbors.com](http://www.boatsandharbors.com)

**Findings of Significance:**

- ☐ Potentially Significant Impact  
☒ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☐ No Impact

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**13. Public Services**

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**Project activities likely to create an impact:** Access and structure removal/demolition.

**Description of Environmental Setting:** The local City of Los Angeles services support the producing oil wells and two land-farm remediation (bug-farm) areas. Police and fire public services are currently available to serve the site. Due to the current single-purpose use of the site for oil field production including bioremediation of oily material, no other demand for public services is required.

**Analysis of Potential Impacts. Describe to what extent project activities would:**

- a. **Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:**

**Fire protection**

Relocation of the oil field equipment to the eastern portion of the project site could require fire protection personnel to be on-site during specific times. This potential impact will be analyzed in the EIR.

**Police protection**

Off-site export of contaminated soils and on-site importation of clean soils could require additional police protection personnel for traffic control. This potential impact will be analyzed in the EIR.

**Schools**

The project does not propose any development. Therefore, no school-age children would be generated by the proposed project and no impacts to school facilities or need for new school would result.

**Parks**

The project does not propose any development. Therefore, no park facilities would be required by the proposed project and no impacts to park facilities would result.

**Other public facilities**

In addition to fire, other emergency response providers may be affected. Refer to Response 12(b), above.

**Specific References:** a. Website: [www.boatsandharbors.com](http://www.boatsandharbors.com)

**Findings of Significance:**

- ☐ Potentially Significant Impact  
☒ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☐ No Impact

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**14. Recreation**

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**Project activities likely to create an impact:** Soil handling.

**Description of Environmental Setting:** The project site does not contain recreational resources. Recreational marinas are located adjacent to and in proximity to the project site.

**Analysis of Potential Impacts. Describe to what extent project activities would:**

- a. **Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.**

The project does not propose any development. During construction, access for marina boat owners will be maintained via Anchorage Road to Shore Road. Construction vehicles will not be accessing this road. All other roads also would remain accessible throughout the project duration. If necessary, local traffic would be rerouted temporarily from Henry Ford Avenue to the existing paved road within the northern section of the project site. This road was utilized during the construction along Henry Ford in 1999/2000. Therefore, no impacts related to physical deterioration of park facilities would result from project implementation.

- b. **Include recreational facilities or require construction or expansion of recreational facilities which might have an adverse physical effect on the environment.**

The project does not include recreational facilities. Therefore, no impacts resulting from the construction or expansion of recreational facilities would result from implementation of the proposed project.

**Specific References:**

**Findings of Significance:**

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

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**15. Transportation and Traffic**

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**Project activities likely to create an impact:** Access, structure removal/demolition, and oil production.

**Description of Environmental Setting:** The project site is in a highly industrialized port area with high volumes of truck traffic on a congested roadway system. Turning movements and access to the site is limited.

**Analysis of Potential Impacts. Describe to what extent project activities would:**

- a. **Cause an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections).**

A traffic impact study will be prepared that will analyze the potential impacts from the off-site export of contaminated soils and on-site import of clean soil. Temporary impacts from haul truck traffic is expected to be significant. In addition, because no development is proposed, no long-term impacts to traffic would result.

- b. **Exceed, either individually or cumulatively, a level of service standard established by the country congestion management agency for designated roads or highway.**

Refer to Response 15(a), above.

- c. **Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).**

Refer to Response 15(a), above.

- d. **Result in inadequate emergency access.**

The project does not propose any development. The existing access point will be maintained, however, due to the large volume of truck traffic, emergency access will be analyzed and any need for mitigation will be provided.

- e. **Result in inadequate parking capacity.**

The project does not propose any development and would therefore not require parking capacity. The project site provides adequate capacity for the off-street parking of construction vehicles. Therefore, no impacts would result.

- f. **Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).**

The project does not propose any development. Therefore, no conflicts with alternative transportation would result.



**Specific References:****Findings of Significance:**

- ☒ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☐ No Impact

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**16. Utilities and Service Systems**


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**Project activities likely to create an impact:** Storm water system.

**Description of Environmental Setting:** The project site contains a stormwater management system for the existing site activities...

**Analysis of Potential Impacts. Describe to what extent project activities would:**

**a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board**

The groundwater remedy may be an ex-situ pump and treatment system which would have a wastewater treatment system. The water would be treated utilizing an air stripper and catalytic oxidizer treatment unit with a carbon bed polishing unit. The water would be discharged either under a LARWQCB National Pollution Discharge Elimination System Permit (NPDES) to either directly to the Consolidated slip or the City of LA's storm drain system. If an NPDES permit is not granted, than the discharge would be to the City of Los Angeles' sewer lines through an industrial wastewater permit. Post remedy, no development is proposed by the project. Therefore, no wastewater impacts would result.

**b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.**

The project does not propose any development. Therefore, no water or wastewater treatment facilities would be required and no impacts would result. Refer to Response 16(a) above.

**c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.**

The potential impacts from reconfiguring the onsite storm water drainage facilities and use of water in the oil field operations and bioremediation will be evaluated. This will include an evaluation of the adequacy of the existing pump station and filtration system to be used after completion of site improvements. In addition, potential impacts related to the net change in water use by the bioremediation and oil field operations will be evaluated.

**d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.**

Potential impacts related to the net change in water use by the bioremediation and oil field operations will be evaluated. Potential impacts during construction could be significant. Because the implementation of the RAP would result in the elimination of the bioremediation efforts and consolidation of the oil field operations, there could be a net decrease in the onsite consumption of water with the implementation of the project.

**e. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments.**

Because the project does not propose any development, no wastewater from domestic sewage would be generated and treatment would not be required. Refer to Response 16(a) above.

- f. Be served by a landfill with sufficient permitted capacity to accommodate the projects solid waste disposal needs.

The project does not propose any development that has the potential to generate significant amounts of solid waste. The small amount of solid waste generated from the short-term construction activities would not be expected to impact landfill capacity.

- g. Comply with federal, state, and local statutes and regulations related to solid waste.

The project would be required to comply with mandatory obligations related to solid waste collection.

**Specific References:**

*Findings of Significance:*

- ☒ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☐ No Impact

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**17. Mandatory Findings of Significance**

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***Analysis of Potential Impacts. Describe to what extent project activities would:***

- a. Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

The project does not have the potential to impact cultural resources. It is anticipated that the project site does not support rare or endangered plants and/or animals. The project does have the potential to impact fish and marine invertebrates.

- b. Have impacts that are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

The EIR will discuss the potential cumulative impacts of the identified cumulative projects, and present the contribution of the proposed Project to any cumulative effects.

- c. Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.

Implementation of the proposed project remedy has the potential to cause adverse effects through the excavation of on-site soils that have been contaminated as a result of past disposal activities and/or on-site oil production. The post-construction effects will result in the cleanup and capping of soil and cleanup of groundwater contamination.

**Specific References:**

*Findings of Significance:*

- ☒ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☐ No Impact

#### V. FINDING OF DE MINIMIS IMPACT TO FISH, WILDLIFE AND HABITAT (Optional)

Prepared only if a Finding of De Minimis Impact to fish, wildlife and habitat is proposed in lieu of payment of the Department of Fish and Game Notice of Determination filing fee required pursuant to section 711.4 of the Fish and Game Code.

#### Instructions

A finding of “no potential adverse effect” must be made to satisfy the requirements for the Finding of De Minimis Impact as required by title 14, California Code of Regulations, section 753.5. “No potential adverse effect” is a higher standard than “no significant impact” and the information requested to provide substantial evidence in support of a “no potential adverse effect” is not identical in either its standard or content to that in other parts of the Initial Study.

In the *Explanation and Supporting Evidence* section below, provide substantial evidence as to how the project will have **no potential adverse effect** on the following resources:

- a) Riparian land, rivers, streams, watercourse, and wetlands under state and federal jurisdiction.
- b) Native and non-native plant life and the soil required to sustain habitat for fish and wildlife.
- c) Rare and unique plant life and ecological community's dependent on plant life.
- d) Listed threatened and endangered plant and animals and the habitat in which they are believed to reside.
- e) All species of plant or animals as listed as protected or identified for special management in the Fish and Game Code, the Public Resources Code, the Water Code, or regulation adopted there under.
- f) All marine and terrestrial species subject to the jurisdiction of the Department of Fish and Game and the ecological communities in which they reside.
- g) All air and water resources the degradation of which will individually or cumulatively result in a loss of biological diversity among the plants and animals residing in that air and water.

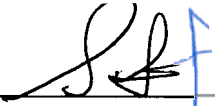

VI. DETERMINATION OF APPROPRIATE ENVIRONMENTAL DOCUMENT

On the basis of this Initial Study:

☐ I find that the proposed project COULD NOT have a significant effect on the environment. A NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED DECLARATION will be prepared.

☒ I find that the proposed project MAY HAVE a significant effect on the environment. An ENVIRONMENTAL IMPACT REPORT will be prepared.

		<u>1/23/2006</u>
DTSC Project Manager Signature		Date
<u>Safouh Sayed</u>	<u>Hazardous Substance Engineer</u>	<u>(714) 484-5478</u>
DTSC Project Manager Name	DTSC Project Manager Title	Phone #
		<u>1/23/06</u>
DTSC Branch/Unit Chief Signature		Date
<u>Thomas Cota, Chief</u>	<u>Chief, Southern California Cleanup Operations Branch</u>	<u>(714) 484-5459</u>
DTSC Branch/Unit Chief Name	DTSC Branch/Unit Chief Title	Phone #

**ATTACHMENT A**  
**INITIAL STUDY REFERENCE LIST**

For

Pier A West/Area 2  
(Project Name)

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Accord Engineering, Inc.

2005 Preliminary Draft Remedial Action Plan (Revision 1). September.

Boats and Harbors website.

2005. [www.boatsandharbors.com](http://www.boatsandharbors.com). Website access October 31

California, State of.

1999 Department of Transportation (Caltrans), California Scenic Highway Mapping System. Website access January 10, 2006.

Los Angeles, City of.

1999 General Plan Land Use Element, Wilmington-Harbor City Community Plan. Website access January 10, 2006.

Tetra Tech, Inc.

Final Remediation Investigation Report for Pier A West. December.

Final Feasibility Study Report for Pier A West/Area 2. August.

2003 Final Baseline Risk Assessment. January.